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Attorneys for Plaintiffs and the Settlement Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DANIEL MATERA and SUSAN
RASHKIS, as individuals, and on behalf of
other persons similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:15-cv-04062 LHK

**SUPPLEMENTAL DECLARATION OF
MICHAEL SOBOL IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND EXPENSES
AND SERVICE AWARDS**

Date: February 8, 2018
Time: 1:30 p.m.
Judge: Hon. Lucy H. Koh
Courtroom: 8, Fourth Floor

I, Michael Sobol, declare as follows:

1. I am a member in good standing of the California State Bar and a partner in the law firm Lieff, Cabraser, Heimann & Bernstein, LLP ("LCHB"), counsel for Plaintiffs and the Class in this proceeding. I submit this supplemental declaration in support of Plaintiffs' Motion for Attorneys' Fees and Expenses and for Service Awards for Plaintiffs, and in response to the

1 Court's request for additional information regarding LCHB staff members Margie Calangian,
2 Richard Anthony, and Anthony Grant.

3 2. I have personal knowledge of the facts set forth herein, and if called to testify
4 thereto, could and would do so competently.

5 3. LCHB's Litigation Support group consists of an experienced team of litigation
6 support specialists responsible primarily for: (a) preparing and conducting trial presentations and
7 similar in-court technical productions; (b) creating, managing, and searching case-specific
8 document and information databases; (c) assisting with technical issues involved in document
9 productions and discovery disputes; and (d) performing certain case-specific data analyses (e.g.,
10 for use in evaluating damages).

11 4. Anthony Grant obtained his Bachelor of Fine Arts in Film Studies from the
12 Academy of Art University in 2010. Mr. Grant has more than fifteen years of experience in
13 administration of E-Discovery databases on different platforms, including four years of
14 experience in administration of the Relativity platform utilized in this litigation.

15 5. Margie Calangian obtained her Bachelor of Science degree in Business
16 Administration from the Philippine School of Business Administration in 2011. She has four
17 years of experience with administration of the Relativity platform utilized in this litigation.

18 6. Richard Anthony obtained his Bachelor of Arts in English Literature at the
19 University of California, with Honors in the Major, and both his Master of Arts and C. Phil. in
20 Literatures in English and Composition Studies from the University of California, San Diego. Mr.
21 Anthony has thirteen years of experience as a senior litigation paralegal and researcher at LCHB,
22 and 1.5 years of experience as a litigation support specialist at LCHB.

23 7. Mr. Anthony transitioned from LCHB's Paralegal-Research Department to the
24 Litigation Support group in 2016. In this litigation, Mr. Anthony's work involved administering
25 the Relativity database and assisting counsel in drafting and negotiating the ESI protocol that was
26 filed in September 2016. His hourly rate for his work as a litigation support specialist is \$375.
27 Because Mr. Anthony's transition to the Litigation Support group is relatively recent, there are no
28

orders approving his rates as a litigation support specialist, but the rate is consistent with approved rates for others performing substantially the same work.

8. Courts in the Northern District of California have approved LCHB's rates for Litigation Support staff, including Mr. Grant and Ms. Calangian. For example:

- *Campbell v. Facebook Inc.*, No. 13-5996, 2017 WL 3581179 (N.D. Cal. Aug. 18, 2017), hourly rates filed at ECF No. 238-1 (approving 2017 hourly rates for Margie Calangian and Anthony Grant of \$375);
- *Allagas v. BP Solar Int'l, Inc.*, No. 14-560, 2016 WL 9114162, at *2 (N.D. Cal. Dec. 22, 2016), hourly rates filed at ECF No. 187-1 (finding 2016 hourly rates for Margie Calangian and Anthony Grant of \$360 reasonable in connection with lodestar cross-check)¹;
- *In re High-Tech Employee Antitrust Litig.*, No. 11-2509, 2015 WL 5158730, at *9 (N.D. Cal. Sept. 2, 2015), hourly rates filed at ECF No. 1083-20 (approving 2015 hourly rate for Anthony Grant of \$340).²

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of February, 2018 in San Francisco, California.

/s/ Michael W. Sobol
Michael W. Sobol

¹ Mr. Anthony performed work on the BP Solar litigation in his capacity as a senior paralegal and researcher in 2016 and was accordingly billed, in that litigation, at the hourly rate for that position and his years of experience: \$345.

² Mr. Anthony performed work as a senior paralegal and researcher in the Hi-Tech litigation and was accordingly billed, in that litigation, at his 2015 hourly rate in that position: \$325.